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April 10, 2025

By ECF

Honorable Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Aubrey Drake Graham v. UMG Recordings, Inc.*
Case No. 1:25-cv-399-JAV
Letter Motion for Extension of the Motion to Dismiss Briefing Schedule

Dear Judge Vargas:

We write on behalf of both parties in the above-captioned matter regarding the briefing schedule for Defendant's motion to dismiss Plaintiff's amended complaint. Per the Court's March 19, 2025 order, Plaintiff's amended complaint is due April 16, 2025. *See* ECF No. 28. Defendant's motion to dismiss is due 21 days after the filing of the amended complaint (May 7), Plaintiff's opposition is due 14 days thereafter (May 21), and Defendant's reply is due seven days after the opposition (May 28). *Id.*

The parties have conferred, and respectfully request an extension of the briefing schedule to grant an additional week for Plaintiff's opposition and an additional week for Defendant's reply brief, such that Plaintiff's opposition would be due 21 days after Defendant's motion to dismiss (May 28), and Defendant's reply would be due 14 days after the opposition (June 11). The extension is sought to afford the parties more time to prepare and consult with their clients on the filings, and because the current briefing schedule sets Defendant's one-week reply deadline over Memorial Day weekend (a scheduling issue that the undersigned inadvertently overlooked when discussing the briefing schedule at the recent conference with the Court). This is the first extension request concerning the briefing schedule for the motion to dismiss the amended complaint. The parties are currently scheduled to next appear before the Court on June 30 for oral argument on the motion to dismiss.

We thank the Court for its time and attention to this matter.

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Respectfully submitted,

/s/ Rollin A. Ransom
Rollin A. Ransom

Attorney for UMG Recordings, Inc.

cc: All counsel of record (via ECF)